

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-89-E
DOCKET NO. 2021-90-E

Duke Energy Carolinas, LLC's 2021)	
Avoided Cost Proceeding Pursuant)	
to S.C. Code Ann. Section 58-41-20(A))	
)	PETITION TO INTERVENE
Duke Energy Progress, LLC's 2021)	
Avoided Cost Proceeding Pursuant)	
to S.C. Code Ann. Section 58-41-20(A))	

The South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE") (collectively, "Petitioners") respectfully petition the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned dockets pursuant to R.103-825 of the Commission's rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On March 10, 2021, the Commission opened these dockets pursuant to S.C. Code Ann. § 58-41-20(A) for the purpose of reviewing Duke Energy Carolinas, LLC's ("DEC") and Duke Energy Progress, LLC's ("DEP") (collectively, "Duke Energy" or "the Companies") "standard offer, avoided cost methodologies, form contract power purchase agreements, commitment to sell forms, and any other terms or conditions necessary to implement [Section 58-41-20 of Act 62]." Act 62 requires the Commission to approve each utility's avoided cost methodologies and related terms at least once every twenty four months after the preceding approval. S.C. Code Ann. § 58-41-20(A).

2. Pursuant to Order No. 2021-257, DEC and DEP filed a joint avoided cost application on April 22, 2021, seeking Commission approval of the Companies'

continued application of the peaker methodology to calculate DEC's and DEP's avoided cost rates, along with the Companies' updated Standard Offer and Standard Offer PPA, form contract power purchase agreement, and notice of commitment to sell form.

3. Act 62 requires "[a]ny decisions by the [C]ommission [in each utility's avoided cost proceeding] [to] be just and reasonable to the ratepayers of the electrical utility, in the public interest, consistent with PURPA and the Federal Energy Regulatory Commission's implementing regulations and orders, and nondiscriminatory to small power producers." S.C. Code Ann. § 58-41-20(A).

4. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from Duke Energy and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of avoided costs. The principal address of CCL is 131 Spring St., Charleston, South Carolina 29403.

5. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members in South Carolina who receive electricity service from Duke Energy and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of

avoided costs. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

6. Petitioners have actively participated in past avoided cost proceedings before the Commission, including but not limited to the Companies' 2019 avoided cost proceedings (Docket Nos. 2019-185-E and 2019-186-E).

7. Through their involvement in this proceeding, Petitioners will advocate for a full and proper valuation of avoided cost rates and transparency in the Companies' calculations. Participation in these proceedings is further aimed at advancing Petitioners' direct and substantial interest in ensuring that solar companies receive the fair rates, terms, and conditions that they are entitled to under federal law and pursuant to Act 62, and supporting clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

8. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 3rd day of June, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 3rd day of June, 2021.
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